



United States Department of the Interior

FISH AND WILDLIFE SERVICE

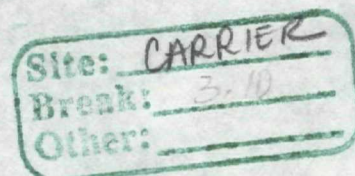
Post Office Box 845
Cookeville, TN 38503

November 28, 1990



*North Superfund
Dec 4 2:12 PM '90
Remedial Branch
BZ*

Ms. Elizabeth Brown, RPM
KY/TN Remedial Section
Waste Management Division
North Superfund Remedial Branch
U.S. EPA, Region IV
345 Courtland Street, N.E.
Atlanta, GA 30365



Dear Ms. Brown:

We have reviewed the Draft Remedial Investigation Report for the Collierville (formerly Carrier Air Conditioning) Site, at Collierville, in Shelby County, Tennessee. The following comments are provided as technical assistance and should be considered as distinct from any official position taken by the United States Department of the Interior regarding pre-ROD agreements, covenants-not-to-sue, or other administrative matters pertaining to CERCLA/SARA-designated trustees for natural resources.

We were pleased to note that a biological investigation had been conducted at this site and that an attempt had been made to correlate observed levels of contamination at the site with risks to biota. The benthic macroinvertebrate study of Nonconnah Creek (bordering the Collierville Site) was aptly conducted and reported by a capable, reputable contractor (Memphis State University's Biology Department). However, the results of this study were ambiguous, as we suggested they might be in our November 5, 1989, letter to Mr. Patrick Tobin regarding the Carrier Air Conditioning Site.

To paraphrase the language contained in the draft RI, there are distinct differences in the macroinvertebrate populations between Station I (above the influence of the Carrier Air Conditioning Site) and Station II (downstream from the ditch which conveys surface water from the Carrier Air Conditioning Site to Nonconnah Creek). The draft RI specifically stated that "fewer benthic taxa existed at Station II and these taxa were distinctly different from those found in the upstream counterpart sites." This indicates that a perturbation has occurred, possibly continues to occur, and/or perhaps occurs periodically.

The problem is that without the aid of data from the other supporting ecological studies that we recommended in our earlier (November 5, 1989) letter, the perturbation cannot be specifically related to organic solvent contamination that may be emanating from the site. In fact, the draft RI suggests that the observed differences between the sample sites are likely



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side effects caused by organic nutrient loading associated with a city stormwater outlet which enters Nonconnah Creek just downstream of Site I. Thus, a site-related biological investigation was conducted, impacts were detected, but there is insufficient evidence to connect the observed impacts to site-related (organic solvent) contamination.

As you know, we believe that it is important to evaluate each CERCLA site's potential risks to components of the ecosystem within which it is located. Ideally, we believe the RPM for a particular site should contact the CERCLA-designated natural resource trustees (NRT's) to obtain their input regarding necessary types and methods of sampling that should be incorporated into the site work and sampling plans. The data generated as a result of incorporating the NRT's sampling recommendations should provide EPA with the empirical evidence to substantiate whether impacts have and/or may be occurring to fish, wildlife, sensitive habitats, threatened and endangered species, and other resources which are deemed as important components of the environment. Realizing that the previously suggested "ideal approach" did not occur for this particular project, we recommend a "one-time" alternative approach in the interest of preventing insufficient ecological impact data from causing delays or postponing remediation efforts at the site.

Due to the fact that contamination at the Collierville Site consists primarily of low concentrations of organic solvents in groundwater, and that this particular situation appears (insufficient ecological data preclude an accurate determination) to pose a low level of risk to natural resources under the jurisdiction of the Fish and Wildlife Service, we therefore recommend that:

- 1) site remediation proceed without waiting for the results of further site-related ecological impact assessments, and
- 2) the Collierville Site RPM convene a meeting of interested natural resources trustees and other appropriate parties (e.g., EPA-ESD) to develop a plan to incorporate an ecological evaluation as part of an overall post-remediation program to monitor the effectiveness of site remediation activities.

If you accept the recommendations listed above, and provide reasonable assurances that EPA will take appropriate action to protect the environment in the event that post-remediation ecological monitoring indicates that natural resources remain at risk from site-related releases of contaminants, then we would be willing to recommend that the U.S. Department of the Interior become a party to a pre-ROD covenant-not-to-sue.

We would be happy to discuss any of the information or recommendations contained in this letter. If you have any questions, contact Mark Wilson of my staff at 615/528-6481.

Thank you for the opportunity to review and comment on the Draft Remedial Investigation Report for the Collierville Site.

Sincerely,

A handwritten signature in cursive script, reading "Lee A. Barclay".

Lee A. Barclay, Ph.D.
Field Supervisor

XC:

USDI, Southeast Region, Atlanta, GA

FWS/FWE, Southeast Region, Atlanta, GA

(Attn: Don Schultz)

TWRA, Central Office, Nashville, TN

(Attn: David McKinney)